

EXHIBIT D

Bichelmeyer, John P. - 30(b)(6)

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3

4 DEBORAH CHIN,
5 Individually and on
6 behalf of all others
7 similarly situated,
8
9 Plaintiff,

10
11 vs. Civil Action No.
12 04-10294-DPW

13 SONUS NETWORKS, INC.
14 LITIGATION,
15 HASSAN AHMED, Ph.D.,
16 and STEPHEN NILL,
17 Defendants.

18
19 30(b)(6) DEPOSITION OF JOHN P. BICHELMEYER,
20 CORPORATE REPRESENTATIVE OF
21 BPI GLOBAL ASSET MANAGEMENT, LLP,
22

23 produced, sworn, and examined on Wednesday, the 15th
24 day of November, 2006, between the hours of 8:00
25 o'clock in the forenoon and 6:00 o'clock in the
26 afternoon of that day at the Intercontinental Hotel,
27 401 Ward Parkway, in the City of Kansas City, County
28 of Jackson, State of Missouri, before:

29
30 PEGGY E. CORBETT, RDR-CCR-CSR
31 Registered Diplomat Reporter
32

33 a Notary Public within and for the County of
34 Jackson, State of Missouri.

35 Taken on behalf of Defendant Sonus Networks, Inc.
36 pursuant to Notice to Take Deposition and Subpoena.
37
38
39

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1 recollection of it?

2 A. There's been hundreds, if not thousands of
3 transactions, so it's possible. I can't say "yes"
4 or "no."

5 Q. Is there any specific reason why you
6 thought that suit should be brought against Sonus?

7 A. It's one thing to make an investment and
8 lose money on it because you just got it wrong, and
9 it's another thing to make an investment based on
10 information that was false, and had the deck stacked
11 against you.

12 Q. And can you tell me what facts, sir, that
13 you're aware of that there was knowledge at Sonus of
14 any falsity of the statements?

15 MR. CERA: I object to the form.

16 THE WITNESS: So the question is?

17 MR. CERA: Lacks foundation. He
18 didn't say anything about knowledge. He said
19 falsity.

20 (Whereupon the prior question was read back by the
21 reporter.)

22 A. I guess it goes back to the fact that
23 there was the lack of financial statements.

24 Q. (BY MR. MATULE) When you -- well, let's
25 talk about this, because you described generally how